

97-62



February 13, 1997

Lester Snow
Executive Director
CALFED Bay-Delta Program
1416 - 9th Street, Suite 1155
Sacramento, California 94814

ACWA's mission is to assist its members in promoting the development, management and reasonable beneficial use of good quality water at the lowest practical cost in an environmentally balanced manner.

Dear Lester:

Enclosed herewith is a proposal for an environmental water best management practices program which I recently received. After reading it, I have decided to send it along to you with a request that it be reviewed by the CALFED Program and discussed by the Bay-Delta Advisory Council.

As you know, I have been advocating for some time, both at BDAC meetings and elsewhere, that an environmental water best management practices program be developed alongside similar programs for agricultural and urban water use. This paper is a credible start on the discussion of such a program.

I should make it clear that I think some of the provisions in this paper may be better addressed in some venue other than a discussion of environmental BMPs. For instance, the management of instream flows is already a subject of intense discussion and debate in the Ecosystem Roundtable, among the CALFED agencies, and among the stakeholders. However, discussions about diversions, management of water, and discharges from wetland areas are issues on which an environmental BMP workgroup could provide some real benefits. Since CALFED will likely include expansion of wetlands as part of its recommended package, this takes on even greater importance.

Some have said that environmental use is different from agricultural or urban water use and should, therefore, not be subjected to efficiency tests. I'm somewhat surprised by that position, since the same could be

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said about the differences between agricultural and urban water uses. The issues, the technologies, and the practices are very different in agricultural and urban settings, but because they both use a valuable resource, they are rightly subjected to scrutiny and to measurable indices of efficiency. Water diverted for and water discharged from environmental uses should likewise be held to some standard in order to maximize the social benefit of a precious and limited resource such as water.

Accordingly, I request that you circulate this to the BDAC members and calendar it for discussion at the earliest convenient date. I will be happy to discuss this with other members of BDAC and to participate in efforts to develop an environmental best management practices program that we can all support.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephen K. Hall', is written over a horizontal line.

STEPHEN K. HALL
Executive Director

SKH:alr
Enclosure